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NOTE AND COMMENT.

DEATH OF GUSTAV STEIN.—Mr. Gustav Stein, one of the members of the first Board of Editorial Assistants of this Review, and later an instructor in this Law School, died in Denver on November 15th. As a student of marked ability and thoroughness, Mr. Stein made a record while in the Law School which resulted in his appointment to an instructorship a year after his graduation. As a member of the teaching staff, his record was a brilliant fulfillment of his earlier promise, and he had, during his second year of teaching, been already promoted to the rank of assistant professor, when his strength proved unequal to the task imposed by his ambition and industry, and he was ordered west in the hope that his health might be benefited. His brave and cheerful struggle for renewed health and strength has now ended; the news of his death will be heard with sorrow by his associates in the Law School, who knew and valued his fine character and ability.

"UNENFORCEABLE TRUSTS" MADE ENFORCEABLE BY STATUTE.—Since the article on "Unenforceable Trusts and the Rule Against Perpetuities" which appeared in the November number of this Review (10 MICH. L. REV. 31) was written,